

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

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NYNEX/Teleport Arbitration)	D.P.U. 96-73/74
NYNEX/Brooks Fiber Arbitration)	D.P.U. 96-75
NYNEX/AT&T Arbitration)	D.P.U. 96-80/81
NYNEX/MCI Arbitration)	D.P.U. 96-83
NYNEX/Sprint Arbitration)	D.P.U. 96-94
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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY'S
FIRST SET OF INFORMATION REQUESTS OF
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.**

New England Telephone and Telegraph Company, d/b/a NYNEX ("NYNEX") requests that AT&T Communications of New England, Inc. ("AT&T") respond to the following information requests addressed to it or its witness. In the event responses to all or part of these requests will not be forthcoming in the time period set forth in the schedule for this proceeding established by the Massachusetts Department of Public Utilities, kindly notify NYNEX as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if AT&T or its witnesses receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If AT&T feels that any request is ambiguous, please notify NYNEX so that the request may be clarified prior to the preparation of a written response.

DEFINITIONS AND INSTRUCTIONS

A. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in

this proceeding.

B. The words "document" and "documentation" are used in their broadest sense and include, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, workpapers, records or reports, bills, checks, articles from journals, or other sources, contracts, agreements, pamphlets, plans, specifications, summaries, studies, and any other data compilations or written matter of any kind from which information can be obtained, and all copies of such documents which bear notations, marginal comments or other markings that differentiate such copies from the original.

C. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of "documents" which are to be identified shall include the documents that do exist.

D. Please serve a copy of the responses to these requests on the Company's attorney, Bruce P. Beausejour, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1. Page 5 of AT&T's submission on "other issues" states that it is AT&T's understanding that there are several possible technical means for NYNEX to route O&DA services to AT&T's platform. Please provide a detailed technical explanation of the different methods referenced including the source of the referenced information, a comparison of the costs and implementation periods for each method, and an explanation of the operational advantages or disadvantages with each method.
2. Explain which of the various methods described above are considered by AT&T to be the "most cost effective technology" as that term is used by AT&T on page 5 and 6 of its submission on "other issues".

On page 6 of AT&T's submission on "other issues", AT&T proposes a six stage timetable for NYNEX to begin routing O&DA services to AT&T's platform.

Please provide for each of the six steps: (a) a detailed explanation of AT&T's understanding of the NYNEX work efforts required in each step and the source of that information; (b) support for the allocated time periods for each step; (c) indicate whether the proposed time periods for each step would vary depending on the selected technology chosen. If the time periods do vary, indicate the extent of the

variation for each identified technology. If they do not vary, provide support for that assertion.

4. Please provide support for AT&T's assertion on pages 11 and 12 of the submission on "other issues" that the telephone directory issue is properly within the scope of arbitration issues under the Act.
5. With respect to performance standards (pages 13-16 of AT&T's submission on "other issues"), is it AT&T's position that performance criteria and the associated process relating to unbundled network elements should be exactly the same as that applicable to the resale of NYNEX's services? If so, please explain why such an approach is reasonable and appropriate. If not, please explain what the differences should be.
6. What is AT&T's position on how Direct Measures of Quality ("DMOQ") should be established?
7. Should DMOQ be a specific number or a range and should they be reviewed or changed periodically? Please explain.
8. Page 15 of AT&T's submission on "other issues" indicates that AT&T is proposing to audit NYNEX performance with respect to DMOQs. Please indicate (a) who would pay for this audit; (b) how often would it be performed and by whom would it be performed; (c) what would be the scope of the audit and how would the results be used; (d) would the results of the audit apply only to service provided to AT&T?
9. Page 16 of the AT&T's submission on "other issues" indicates that quarterly reports should be provided to carriers and the Department on inter-carrier service provisioning and that the report should include data sufficient to demonstrate that the carrier provisioning specifications have been satisfied. Please indicate what specific data AT&T is proposing should be included, and why this data is necessary.
10. Page 16 of the AT&T's submission on "other issues" also states that NYNEX should be required to modify its existing reports on local exchange service quality sufficient to determine if there is any material difference between the quality of service received by NYNEX's end users and NYNEX's reseller end users. Please indicate the specific modifications that AT&T asserts are necessary and indicate why those modifications should be required.
11. Page 16 of the AT&T's submission on "other issues" states that NYNEX should be required to pay liquidated damages whenever NYNEX fails to meet designated performance standards for a designated period. Please describe in detail AT&T's proposal for determining liquidated damages. With respect to the referenced time

period for applying liquidated damages, please indicate how AT&T arrived at the proposed three month period and explain why that period is appropriate. Does AT&T intend that the three month period apply to any and all performance standards? If so, explain why that is appropriate.

12. Page 22 of the AT&T's submission on "other issues" indicates that new entrants will incur substantial operational and interface costs. Please provide a description and quantification of the referenced costs for AT&T.
13. Page 33 of AT&T's submission on "other issues" indicates that the ceiling for forward looking cost of any nonrecurring activity that can be accomplished largely through software or other electronic means should be five dollars. Please define more precisely what is meant by any nonrecurring activity that can be accomplished largely through software or other electronic means. In addition please provide cost support for the proposed five dollar charge.
14. Referring to Page 44 of AT&T's submission on "other issues", what would be the process by which it would be determined (a) whether NYNEX unreasonably failed to meet a deadline for collocation; (b) the extent to which equipment "sits idle as a result of the delay"; and (c) the appropriate interest rate to be applied.
15. Referring to page 50 of the submission on "other issues", is it AT&T's position that NYNEX is required to provide access to dark fiber pursuant to the Telecommunications Act? If so, please provide the appropriate Act reference which includes this requirement.